

SEALED**UNITED STATES DISTRICT COURT**

for the

Northern District of Texas

FILED**June 11, 2020****KAREN MITCHELL
CLERK, U.S. DISTRICT COURT**

United States of America)

v.)

ARMANDO RAMIREZ-HERNANDEZ)

Case No.)

3:20-MJ-)

3:20-MJ-575-BT)

*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 18, 2020 in the county of Dallas in the
Northern District of Texas, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. § 2252(a)(2)

Distribution of Child Pornography

This criminal complaint is based on these facts:

See Affidavit

☒ Continued on the attached sheet.*Complainant's signature*

Rosie A. Manning, Special Agent

Printed name and title

Agent sworn and signature confirmed via reliable electronic means, pursuant to Fed. R. Crim. P. 4.1.

Date: 6/11/2020*Judge's signature*City and state: Dallas, Texas

REBECCA RUTHERFORD, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Rosie A. Manning, being duly sworn under oath, do hereby depose and state:

INTRODUCTION

1. I am a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations (HSI), and I have been employed in this capacity since August 2019. I was previously employed with the United States Secret Service (USSS) from 2010 to 2019. I am a graduate of the Criminal Investigator Training Program, the United States Secret Service Uniformed Division Training Course, and the HSI Special Agent Training Academy. As a result of my employment with HSI, my duties include, but are not limited to, the investigation and enforcement of Titles 8, 18, 19, 21 and 31 of the United States Code (U.S.C.). I am an “investigative or law enforcement officer of the United States” within the meaning defined in 18 U.S.C. § 2510(7), in that I am an agent of the United States authorized by law to conduct investigations of, and make arrests for, federal offenses.

2. I am currently assigned to the HSI Dallas Field Office, Child Exploitation Group, where I investigate criminal violations relating to the sexual exploitation of children, including the illegal production, distribution, transportation, receipt, and possession of child pornography. I have received training in the area of child exploitation, and have observed and reviewed several examples of child pornography, as defined in 18 U.S.C. § 2256, in various forms of media. Based on my training and experience, I am aware that it is a violation of 18 U.S.C. § 2252(a)(2) for any individual to knowingly distribute any visual depiction of a minor engaging in sexually explicit

conduct, using any means or facility of interstate or foreign commerce, including by computer.

3. This affidavit is made in support of a criminal complaint charging Armando RAMIREZ-Hernandez (hereinafter, "RAMIREZ") with violating 18 U.S.C. § 2252(a)(2), Distribution of Child Pornography. The information set forth in this affidavit comes from an investigation I have conducted, my training and experience, as well as information provided to me by other law enforcement officers. Because this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause to believe that on or about April 18, 2020, in the Northern District of Texas, RAMIREZ knowingly distributed child pornography using any means or facility of interstate or foreign commerce, in violation of 18 U.S.C. § 2252A(a)(2).

FACTS IN SUPPORT OF PROBABLE CAUSE

4. In February 2020, HSI Dallas received information regarding a Kik¹ account that was flagged for uploading child pornography. The information indicated that on August 24, 2019, Kik user "junxxr" distributed an image file that was identified by software to be associated with child pornography. A Kik employee viewed the image to confirm it contained child pornography, and the information was subsequently reported to the Royal Canadian Mounted Police (RCMP).

¹ Kik is an instant messaging mobile application that allows users to exchange messages, photos and videos, and to engage in video chat.

5. RCMP personnel researched the log-in data for the “junxxr” account, which indicated the account was accessed several times using Internet Protocol (IP) address 47.222.121.150. Since the user of this account appeared to be located in the United States, the RCMP forwarded the information to the HSI Cyber Crimes Center (C3) in Fairfax, Virginia. HSI C3 conducted further research into this IP address, and determined that it was owned by Suddenlink Communications and resolved to the Seagoville, Texas area. Based on this information, the referral was forwarded to the HSI Dallas Child Exploitation Group for further investigation.

6. During my review of the account information for “junxxr”, I observed subscriber information that indicates the user of this account listed his first name as “Armando” and provided email address “juniorxx09@gmail.com” during the account registration process. The subscriber information also indicated the device associated with the account was an Apple iPhone. I also reviewed the image uploaded by this user that was flagged as child pornography, which is described as follows:

Hash Value	File Description
11C4255FE6[redacted]	An image of a minor boy with an adult penis in his mouth.

Based on my training and experience, this image meets the federal definition of child pornography, as defined in 18 U.S.C. § 2256.

7. On February 18, 2020, HSI Dallas served a summons on Suddenlink Communications for subscriber information relating to the customer assigned IP address 47.222.121.150 on the date this IP address was used to distribute child pornography by

Kik user “junxxr”. On or about March 10, 2020, Suddenlink complied with the summons and provided the following subscriber information for this customer:

First Name: Armando
Last Name: Ramirez
Address: 3024 Melrose Drive, Seagoville, Texas 75159
Type of Service: Internet
Contact Phone: 972-222-5633

8. In April 2020, HSI Dallas received information from the National Center for Missing and Exploited Children² (NCMEC) regarding a Snapchat³ account that was flagged for distributing child pornography. The information contained in this report indicated that on or about February 25, 2020, Snapchat account holder with username “bslide19” and email address blide9@gmail.com utilized IP address 47.222.121.150 to distribute an image depicting child pornography. I reviewed the reported image, which is described as follows:

File Name	File Description
[redacted]37868.JPEG	An image of two minor girls who are nude from the waist down to the knees, exposing their genitals to the camera, which is the focus of the image.

Based on my training and experience, this image meets the federal definition of child

² NCMEC serves as a national clearinghouse that collects, gathers, analyzes, and reports information regarding missing and sexually exploited children for private companies and law enforcement.

³ Snapchat is a multimedia messaging and social media mobile application managed by Snap Incorporated that allows users to share images, videos, and chat messages.

pornography, as defined in 18 U.S.C. § 2256.

9. On April 27, 2020, HSI Dallas served a summons on Suddenlink for updated subscriber information relating to the customer assigned IP address 47.222.121.150. On or about May 1, 2020 Suddenlink reported that this IP address was still assigned to the Internet services at 3024 Melrose Drive, Seagoville, Texas on February 25, 2020, when this IP address was used to distribute child pornography by Snapchat user “bslide19.”

10. Based in part on this information, on May 13, 2020, HSI Dallas and the Seagoville Police Department executed a search warrant at 3024 Melrose Drive, Seagoville, Texas. RAMIREZ was at the residence during the warrant execution, and agreed to speak with law enforcement regarding the investigation. During a post-*Miranda* interview, RAMIREZ admitted to owning and using the Kik account under username “junxxr” referenced in Paragraph 4. RAMIREZ admitted to owning and using the email address blide9@gmail.com referenced in Paragraph 8. RAMIREZ indicated that he may be in possession of child pornography on his cellular phone, and advised that he did not recall everything he would do when using methamphetamines. Pursuant to the search warrant, law enforcement seized two Apple iPhones and a laptop computer claimed by RAMIREZ.

11. During the subsequent forensic analysis of these devices, HSI discovered numerous files depicting child pornography on each of these devices. Furthermore, the analysis of RAMIREZ’s Apple iPhone XR revealed the device was synchronized to a

WhatsApp⁴ account. During a review of the WhatsApp messages stored on this device, HSI observed a text conversation between RAMIREZ and another user, in which several digital files were shared. The details of this conversation indicate that, on or about April 18, 2020, RAMIREZ distributed the following video file to another individual using WhatsApp:

File Name	File Description
IMG_9754.MOV	A video of an adult male inserting his penis into the genitals of a minor girl, who is approximately 4 to 7 years old.

Based on my training and experience, this video constitutes child pornography, as defined in 18 U.S.C. § 2256.

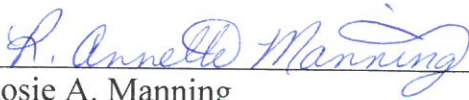
12. Based on my training and experience, I am aware that use of the WhatsApp application, including sending and receiving digital files, requires use of the Internet, a means and facility of interstate and/or foreign commerce.

CONCLUSION

13. Based on the facts and circumstances set forth in this affidavit, I submit that there is probable cause to believe that on or about April 18, 2020, Armando RAMIREZ-Hernandez did knowingly distribute child pornography using any means or facility of interstate or foreign commerce, including by computer, in violation of 18 U.S.C.

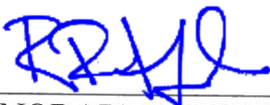
⁴ WhatsApp is a text and voice messaging mobile application that allows instant messages, voice calls and video chats using Internet service.

§ 2252(a)(2). Accordingly, I respectfully request that this Court issue a warrant authorizing the arrest of Armando RAMIREZ-Hernandez for this offense.



Rosie A. Manning
Special Agent
Homeland Security Investigations

Agent sworn and signature confirmed via reliable electronic means, pursuant to Fed. R. Crim. P. 41(d)(3) this 11 th day of June 2020.



HONORABLE REBECCA RUTHERFORD
UNITED STATES MAGISTRATE JUDGE
NORTHERN DISTRICT OF TEXAS